



**NEPTUNE INVESTMENTS GROUP
INVESTMENT POLICY
(2018)**

1. INTRODUCTION

This is an Investment policy for Neptune Investments Group (hereinafter referred to as NIG). The purpose of this Investment Policy Statement is to establish guidelines for the use of funds collected by NIG or any subsidiaries that may occur from it.

This policy is primarily developed to guide all NIG investments and may be reviewed at the end of every fiscal year if need arises.

2. INVESTMENT GOALS AND OBJECTIVES

The main investment goal will be to ensure asset value, exclusive of contributions and withdrawals grows over the long run through a combination of investment income, capital appreciation and a rate of return (to be added later after further discussion)

The policy will be adopted to achieve the following objectives:

- a) Maximize return within reasonable and prudent levels of risk. NIG will in this regard aim to provide a return tracing the return of the benchmark index (set above) within tolerable ranges.
- b) Provide returns comparable to returns for similar investment options.
- c) Provide exposure to a wide range of investment opportunities in various economic sectors.
- d) Control administrative and management costs.
- e) Achieve diversification within the equity market by allocating funds to various economic sectors (In case we decide to venture into the stock market)

3. ASSET ALLOCATION POLICY

The following allocation of NIG funds shall serve as the general guidelines for its investments.

<u>Asset Class</u>	<u>Target Allocation</u>
Loans	80%
Equity Market	10%
Fixed Deposit	10%
Cash	0%

The asset mix policy represents a long term view and as such, rapid and significant market movements may cause the asset mix to fall outside the policy range. Any such divergence should be of a short structure.

4. INVESTMENT EVALUATION

The set performance benchmarks for the fund shall be evaluated by The Finance, Loans and Investments Committee on an ongoing basis to ensure that they continue to reflect the features for which they were originally selected.

The benchmarks shall only be changed by The Finance, Loans and Investments Committee if some significant shift in the market or legislation occurs deeming the benchmarks useless.

5. POLICY REVIEW

The various policies and objectives of NIG will be reviewed periodically. These reviews will focus on the continued feasibility of the objectives and the continued appropriateness of the investment policies for achieving the objectives.

It is not anticipated that objectives and policies will be changed frequently.

6. DELEGATION

The Finance, Loans and Investments Committee shall delegate as it deems appropriate to its members to monitor cash flow on a regular basis hence to ensure sufficient liquidity is maintained to fund payment outflows. When withdrawals are necessary, the committee shall notify the Executive Committee well in advance so as to allow them sufficient time to build up necessary liquid reserves. The Investments Manager is expected to review the cash flow requirements with The Finance, Loans and Investments Committee at least quarterly.

7. RISK TOLERANCE

The equity and fixed deposit portfolio should be well diversified to avoid undue exposure to any single economic sector, industry or individual security.

8. STATEMENT OF RESPONSIBILITY

It is expected that these parties (i.e. Investments Manager, Finance, Loans and Investments Committee, Executive Committee) will discharge their respective duties as pertaining to any NIG's investments, in accordance with normal fiduciary standards with care, prudence and diligence under the circumstances then prevailing, that a prudent person acting in like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and of like aims and by diversifying the investments so as to minimize the risk of large losses.

Acceptance

We the undersigned Executive Officers of Neptune Investments Group do hereby accept and adopt this Investment Policy for and on behalf of Neptune Investments Group together with any changes or alterations that have been initialed or signed by us.

_____	_____	_____
Chairperson	Signature	Date
_____	_____	_____
Vice Chairperson	Signature	Date
_____	_____	_____
Secretary	Signature	Date
_____	_____	_____
Treasurer	Signature	Date
_____	_____	_____
Investments Manager	Signature	Date